**Before the**
**Federal Communications Commission**
**Washington, D.C. 20554**

| | | |
|---|---|---|
| In the Matter of | ) | |
| | ) | |
| Advanced Television Systems | ) | MB Docket No. 87-268 |
| and Their Impact Upon the | ) | |
| Existing Television Broadcast | ) | |
| Service | ) | |
| | ) | |

To: The Commission

## PETITION FOR RECONSIDERATION

WSJV Television, Inc. ("WSJV"), licensee of WSJV, Channel 28, and permittee of WSJV-DT, Channel 58, Elkhart, Indiana (Facility ID No. 74007), by its attorneys and pursuant to Section 1.106 of the Commission's regulations, hereby petitions for reconsideration of Appendix B of the *Seventh Report and Order and Eighth Further Notice of Proposed Rulemaking* in the above-captioned proceeding.[1] As the attached engineering statement describes in detail, WSJV seeks modification to the technical parameters allotted to WSJV-DT in Appendix B, in order that its digital facility may effectively replicate existing analog service as WSJV had certified.

Respectfully submitted,

WSJV Television, Inc.

/s/
Timothy J. Cooney
Wilkinson Barker Knauer, LLP
2300 N Street, N.W., Suite 700
Washington, DC 20037

October 26, 2007

[1] *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, MB Docket No. 87-268, *Seventh Report and Order and Eighth Further Notice of Proposed Rulemaking*, FCC 07-138, 22 FCC Rcd 15581 (rel. Aug. 6, 2007).

**ENGINEERING STATEMENT**
**WSJV TELEVISION, INC.**

## INTRODUCTION

WSJV Television, Inc., licensee of analog TV station WSJV, Channel 28, and permittee of DTV station WSJV-DT, Channel 58, Elkhart, Indiana (Facility ID No. 74007), seeks reconsideration of the Commission action in MB Docket 87-268 that changed the "certification facilities" in connection with WSJV's tentative channel designation for post-transition digital operation. See *Seventh Report and Order, Appendix D2* ("Granted Requests For Changes To Certification That Meet The Interference Criteria"), FCC 07-138 ("7th R&O). A request to correct the station's Appendix B facilities was initiated in the reply comments submitted by the licensee in response to the *Seventh Further Notice of Proposed Rule Making*, FCC 06-150 ("7th FNPRM"), wherein a change in the tentatively approved replication facilities listed in Appendix B for WSJV was sought to ensure that the existing directional antenna system of the licensed analog facility, as authorized in BLCT-19991223ACN, could be utilized for post-transition digital operation on Channel 28 to effectively replicate existing analog service. Contrary to the licensee's actual request the Commission changed the station's "certification facilities" to non-replicating parameters that match the smaller coverage footprint of WSJV's interim DTV Channel 58 facilities authorized in BMPCDT-20050620ABX. The licensee therefore reiterates the original request to modify the replication facilities for WSJV, as specified in 7th FNPRM, so that the existing directional antenna system of the associated analog facility can be used to provide post-transition digital service to all viewers currently receiving analog service from WSJV.

**BACKGROUND**

The basis for changing the replication facilities for WSJV stems back to the creation of the original DTV Table in the *Sixth Report & Order, DTV Allocations,* FCC 97-115. Specifically, an inaccuracy in the orientation of the directional antenna system that existed on WSJV's analog television station license prior to December 23,1999 was carried over to the station's associated digital Channel 58 allotment when the initial DTV table was created in 1997. Curative steps were subsequently taken by the licensee to resolve the discrepancy in the station's antenna orientation. For instance the analog station license was successfully modified as evidenced in BLCT-19991223ACN and a maximization permit to construct a nondirectional operation on DTV Channel 58 was also obtained.

It was not possible for the licensee to eliminate the discrepancy that was built into the original DTV table even though the analog station license as corrected in 1999 was included in the Commission's certification database and considered in the evaluation of digital channel elections. WSJV elected its only in-core channel based on the certification that the station would construct replication facilities for post-transition digital operation, and as a result the Commission relied on the initial DTV Channel 58 allotment parameters and service area to compute the reference facilities tentatively approved in the channel election process as confirmed by contour map attached as Figure 1. Thus the Appendix B facilities proposed for post-transition digital operation on Channel 28 in the 7$^{th}$ FNPRM were determined by the Commission based on the incorrect antenna pattern rotation.

Pursuant to criteria outlined in the 7$^{th}$ FNPRM the licensee timely filed a request to modify WSJV's replication facilities to accurately reflect the existing directional antenna and pattern rotation that will be used for post-transition digital broadcasting on Channel 28. As

stated above, the subsequent 7th R&O changed the Appendix B facilities for WSJV to match the station's current DTV facility authorization on Channel 58.

**PROPOSED REPLICATION FACILITIES**

The licensee requested a change in the Appendix B facilities for WSJV in reply comments to the 7th FNPRM in order to ensure that the station's actual analog service area would be fully replicated, and to secure the station's existing UHF Channel 28 directional antenna system for continued use in the post-transition era. Since the initial DTV allotment on Channel 58 was established based on erroneous antenna information, the licensee asked the Commission to designate WSJV's licensed analog facility as the appropriate measure for establishing replication facilities for post-transition digital operation on Channel 28. The licensee also specified the actual directional antenna specifications (i.e. Antenna ID No. 30747 and 60 degrees rotation) in lieu of the theoretical antenna pattern that is normally calculated for replication.

As before, the licensee seeks to change the Appendix B facilities for WSJV to reflect replication of the station's current analog service based on use of the existing directional antenna to be employed for post-transition service. A maximum ERP of 201.8 kW is required to replicate the service area footprint established from the parameters authorized in BLCT-19991223ACN. As demonstrated by the antenna relative field patterns and data provided in Figures 2 and 3, the theoretical replication pattern calculated in accordance with the OET 69 methodology involves greater suppression in the nulls of the trilobe shaped pattern than that of the measured pattern supplied by the manufacturer of the existing antenna. Therefore applying the standard replication procedures is not ideal in this case since continued use of the existing antenna will be limited to a maximum ERP of 143.7 kW,

which as demonstrated in Figure 4 constitutes a 1.473 dB reduction in power. The above power reduction scenario will not only prevent WSJV from achieving 100% service replication, but will necessitate a power increase proposal at the application stage that will require coordination with Canada and most likely violate the current application freeze.

The precise replication facilities that the licensee now proposes for WSJV are fully described in the Tech Box attachment of Figure 5. In view of the fact that post-transition use of the analog station's existing antenna will result in some de minimis extension of the noise-limited contour in certain directions beyond the present Grade B contour (63.11 dBu with dipole modification), a map depicting the slight increase in service is attached as Figure 6. The noise-limited contour representing the change in Appendix B facilities that the Commission approved in 7th R&O is likewise shown. It is notable that the proposed Appendix B facilities do not involve contour extension beyond the combined contours of the licensed analog station and the Appendix B facilities specified in the 7th R&O.

A summary of the detailed interference analysis that was conducted concerning reconsideration of the Appendix B facilities specified for WSJV in the 7th R&O is provided as Figure 7. The summary gives a side-by-side comparison of the new facility proposal for WSJV and the previous evaluation results for the Appendix B facilities specified in the 7th FNPRM and 7th R&O. The analysis results were determined using a commercial version of the TV Interference and Spacing Analysis software that was developed for the Commission by Techware, Inc. The summary demonstrates that the proposed Appendix B facilities for WSJV are less intrusive on other stations than the facilities specified in the 7th FNPRM and involve no greater impact than the facilities contained in the 7th R&O.

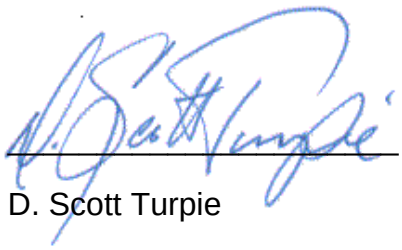
Accordingly, the technical information in Appendix B of the 7th R&O regarding the allotment for WSJV in Elkhart, IN can be modified as follows:

| Facility ID | State & City | NTSC | DTV | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Chan | Chan | ERP (kW) | HAAT (m) | Antenna ID | Latitude (DDMMSS) | Longitude (DDMMSS) | Area (sq km) | Population (thousand) | % Interference Received |
| 74007 | IN ELKHART | 28 | 28 | 201.8 | 335 | TBD | 413658 | 861138 | 21680 | 1342 | 3.5 |

**CONCLUSION**

WSJV Television, Inc. is attempting to correct the discrepancy in antenna orientation that was incorporated in the 7th FNPRM Appendix B facilities for WSJV and does not wish for the Commission to change it's pre-election certification to replicate. In addition, the licensee also seeks to substitute the actual antenna pattern of the existing directional antenna system that will be used for post-transition digital transmission in lieu of the replication pattern that is usually calculated by the Commission using the OET 69 methodology.

Respectfully submitted,
**LOHNES AND CULVER**



D. Scott Turpie

October, 2007

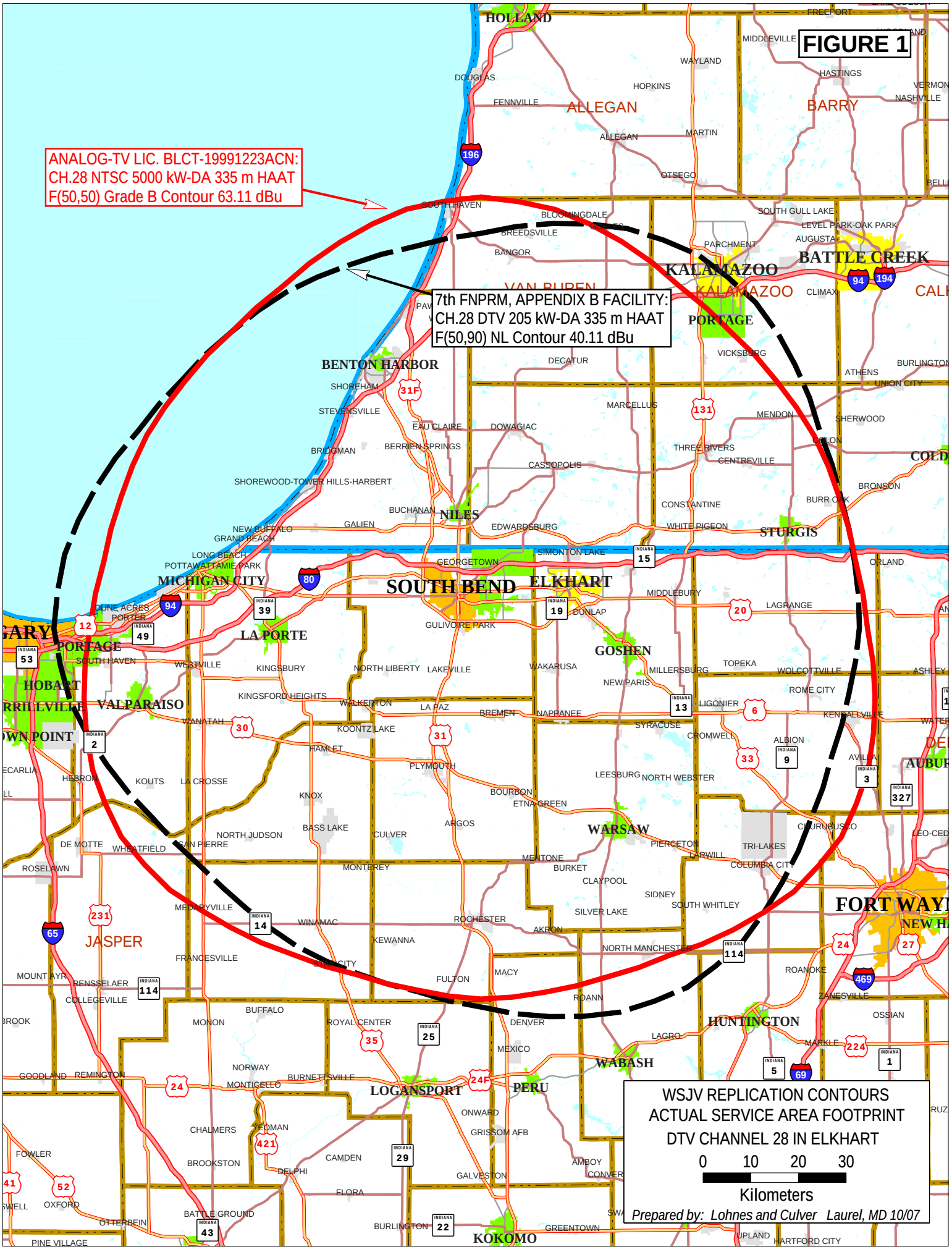
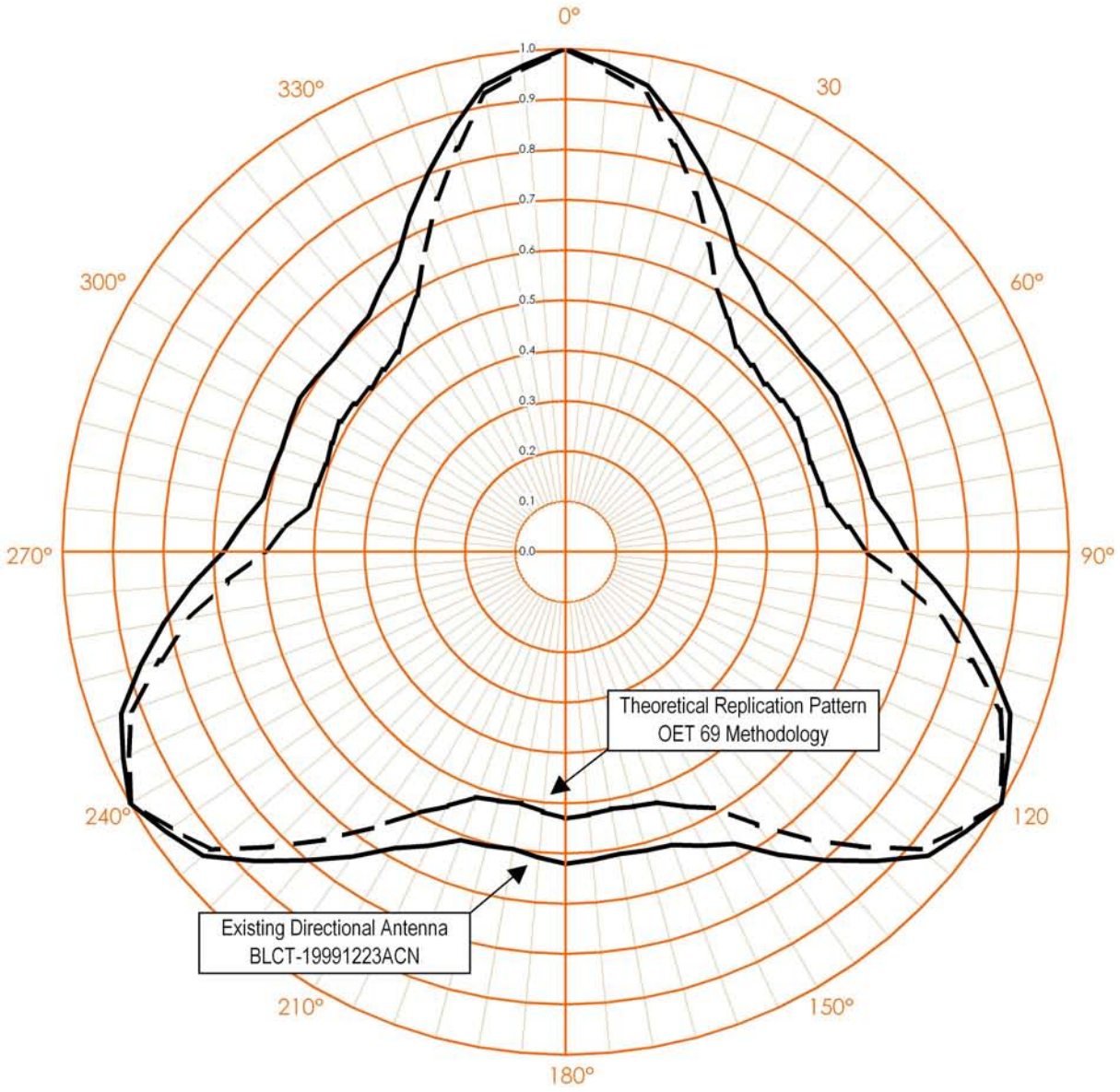


FIGURE 1
ANALOG-TV LIC. BLCT-19991223ACN:
CH.28 NTSC 5000 kW-DA 335 m HAAT
F(50,50) Grade B Contour 63.11 dBu
7th FNPRM, APPENDIX B FACILITY:
CH.28 DTV 205 kW-DA 335 m HAAT
F(50,90) NL Contour 40.11 dBu
WSJV REPLICATION CONTOURS
ACTUAL SERVICE AREA FOOTPRINT
DTV CHANNEL 28 IN ELKHART
0 10 20 30
Kilometers
Prepared by: Lohnes and Culver Laurel, MD 10/07
HOLLAND
ALLEGAN
BARRY
KALAMAZOO
BATTLE CREEK
PORTAGE
BENTON HARBOR
NILES
SOUTH BEND
ELKHART
MICHIGAN CITY
LA PORTE
GOSHEN
STURGIS
WARSAW
FORT WAYNE
HUNTINGTON
WABASH
PERU
LOGANSPORT
JASPER
VALPARAISO
KOKOMO

**FIGURE 2**
**ANTENNA RELATIVE FIELD PATTERNS**
**WSJV CH. 28 IN ELKHART**

**HORIZONTAL PLANE**




**No Rotation**

Project No. 275
Station: WSJV-DT
Channel: 28 (554-560 MHz)

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October 2007

**FIGURE 3**
**ANTENNA RELATIVE FIELD DATA**
**WSJV CH. 28 IN ELKHART**

| Azimuth (Degrees) | Theoretical Replication Pattern Calculated Using OET 69 Method ( Relative Field ) | Proposed Replication Pattern FCC File BLCT-19991223ACN ( Relative Field) |
|---|---|---|
| 0 | 1.000 | 1.000 |
| 10 | 0.923 | 0.940 |
| 20 | 0.758 | 0.810 |
| 30 | 0.600 | 0.680 |
| 40 | 0.530 | 0.620 |
| 50 | 0.518 | 0.610 |
| 60 | 0.530 | 0.620 |
| 70 | 0.518 | 0.610 |
| 80 | 0.530 | 0.620 |
| 90 | 0.600 | 0.680 |
| 100 | 0.758 | 0.810 |
| 110 | 0.920 | 0.940 |
| 120 | 0.997 | 1.000 |
| 130 | 0.921 | 0.940 |
| 140 | 0.746 | 0.800 |
| 150 | 0.589 | 0.670 |
| 160 | 0.530 | 0.620 |
| 170 | 0.519 | 0.610 |
| 180 | 0.530 | 0.620 |
| 190 | 0.507 | 0.600 |
| 200 | 0.519 | 0.610 |
| 210 | 0.601 | 0.680 |
| 220 | 0.747 | 0.800 |
| 230 | 0.921 | 0.940 |
| 240 | 0.998 | 1.000 |
| 250 | 0.920 | 0.940 |
| 260 | 0.757 | 0.810 |
| 270 | 0.600 | 0.680 |
| 280 | 0.518 | 0.610 |
| 290 | 0.506 | 0.600 |
| 300 | 0.518 | 0.610 |
| 310 | 0.507 | 0.600 |
| 320 | 0.518 | 0.610 |
| 330 | 0.589 | 0.670 |
| 340 | 0.747 | 0.800 |
| 350 | 0.924 | 0.940 |

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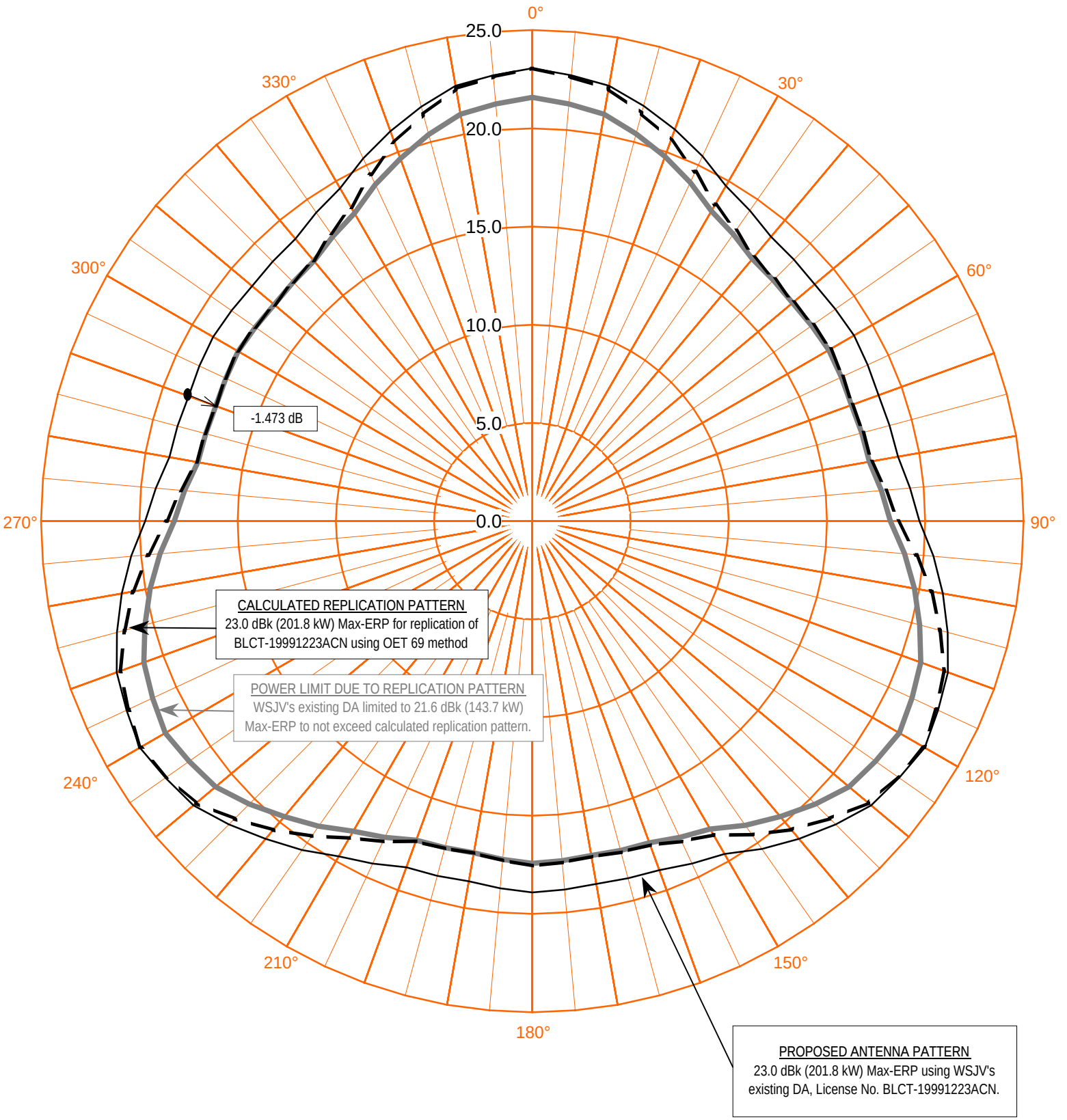
October 2007

**FIGURE 4**
**HORIZONTAL PLANE RADIATION PATTERN (dBk)**
**WSJV CH. 28 IN ELKHART**

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# FIGURE 5
# PROPOSED APPENDIX B FACILITIES

**RE: PETITION FOR CONSIDERATION OF 7TH R&O, FCC 07-138**

WSJV TELEVISION, INC.

**TECHNICAL SPECIFICATIONS:**
WSJV ELKHART, IN - FAC ID 74007

**TECH BOX**

1. Channel Number: 28 FCC Form 381 Certification: Replication (BLCT-19991223ACN)
2. Zone: ☑ I ☐ II ☐ III
3. Antenna Location Coordinates: (NAD 27)

41 ° 36 ' 58 " ☑ N ☐ S Latitude
86 ° 11 ' 38 " ☐ E ☑ W Longitude

4. Antenna Location Site Elevation Above Mean Sea Level: 265 meters
5. Overall Tower Height Above Ground Level: 319 meters
6. Height of Radiation Center Above Ground Level: 310 meters
7. Height of Radiation Center Above Average Terrain: 335 meters
8. Maximum Effective Radiated Power (average power): 201.8 kW
9. Directional Antenna Relative Field Values:

| Degree | Value | Degree | Value | Degree | Value | Degree | Value | Degree | Value | Degree | Value |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 0 | 1.00 | 60 | 0.62 | 120 | 1.00 | 180 | 0.62 | 240 | 1.00 | 300 | 0.61 |
| 10 | 0.94 | 70 | 0.61 | 130 | 0.94 | 190 | 0.60 | 250 | 0.94 | 310 | 0.60 |
| 20 | 0.81 | 80 | 0.62 | 140 | 0.80 | 200 | 0.61 | 260 | 0.81 | 320 | 0.61 |
| 30 | 0.68 | 90 | 0.68 | 150 | 0.67 | 210 | 0.68 | 270 | 0.68 | 330 | 0.67 |
| 40 | 0.62 | 100 | 0.81 | 160 | 0.62 | 220 | 0.80 | 280 | 0.61 | 340 | 0.80 |
| 50 | 0.61 | 110 | 0.94 | 170 | 0.61 | 230 | 0.94 | 290 | 0.60 | 350 | 0.94 |
| Additional Azimuths | | | | | | | | | | | |

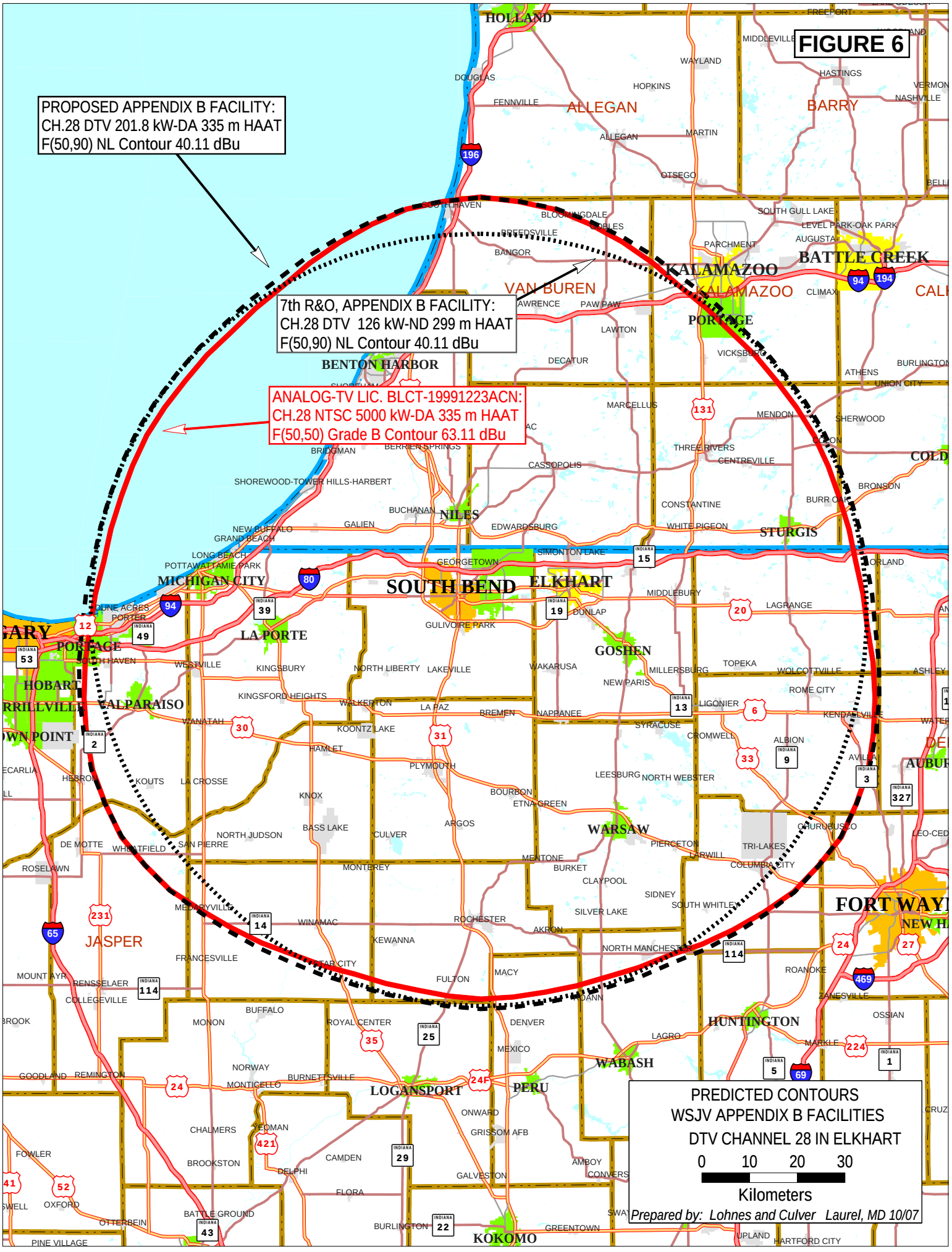
FIGURE 6
PROPOSED APPENDIX B FACILITY:
CH.28 DTV 201.8 kW-DA 335 m HAAT
F(50,90) NL Contour 40.11 dBu
7th R&O, APPENDIX B FACILITY:
CH.28 DTV 126 kW-ND 299 m HAAT
F(50,90) NL Contour 40.11 dBu
ANALOG-TV LIC. BLCT-19991223ACN:
CH.28 NTSC 5000 kW-DA 335 m HAAT
F(50,50) Grade B Contour 63.11 dBu
HOLLAND
ALLEGAN
BARRY
KALAMAZOO
BATTLE CREEK
VAN BUREN
PORTAGE
BENTON HARBOR
MICHIGAN CITY
SOUTH BEND
ELKHART
LA PORTE
NILES
STURGIS
GOSHEN
WARSAW
FORT WAYNE
JASPER
LOGANSPORT
PERU
WABASH
HUNTINGTON
PREDICTED CONTOURS
WSJV APPENDIX B FACILITIES
DTV CHANNEL 28 IN ELKHART
0 10 20 30
Kilometers
Prepared by: Lohnes and Culver Laurel, MD 10/07

# FIGURE 7
# SUMMARY OF INTERFERENCE ANALYSES
# RE: 28A IN ELKHART

| AFFECTED STATIONS | 28A IN ELKHART | | | |
|---|---|---|---|---|
| | Baseline Calculation (Certification Database) | 7th FNPRM, FCC 06-150 Appendix B Facilities | 7th R&O, FCC 07-138 Appendix B Facilities | Petiton for Reconsideration Proposed Appendix B Facilities |
| Results for: 27A IL CHICAGO | | | | |
| HAAT 510.0 m, ERP 160.0 kW | | | | |
| Population within NL Contour | 9,296,588 | 9,296,588 | 9,296,588 | 9,296,588 |
| not affected by terrain losses | 9,296,521 | 9,296,521 | 9,296,521 | 9,296,521 |
| lost to NTSC IX | 41,451 | 40,634 | 40,634 | 40,634 |
| lost to additional IX by DTV | 1,362 | 22,709 | 12,320 | 11,252 |
| lost to IX by DTV only | 1,448 | 22,862 | 12,473 | 11,405 |
| lost to all IX | 42,813 | 63,343 | 52,954 | 51,886 |
| | | | | |
| Potential Interfering Stations: | 27N IL Urbana BLCT-20020226AAA | 27N IL Urbana BLCT-20020226AAA | 27N IL Urbana BLCT-20020226AAA | 27N IL Urbana BLCT-20020226AAA |
| | 27N OH Bowling Green BPET-20030613AFZ | 27N OH Bowling Green BPET-20030613AFZ | 27N OH Bowling Green BPET-20030613AFZ | 27N OH Bowling Green BPET-20030613AFZ |
| | 27N WI Madison BLCT-20000306AAW | 27N WI Madison BLCT-20000306AAW | 27N WI Madison BLCT-20000306AAW | 27N WI Madison BLCT-20000306AAW |
| | 28N IN Elkhart BLCT-19991223ACN | 28A IN Elkhart BDTV-00000110 | 28A IN Elkhart BMPCT-20050620ABX | 28A IN Elkhart Proposal |
| | 27A IA Cedar Rapids BPCDT-19991028ACW | 27A IA Cedar Rapids BPCDT-19991028ACW | 27A IA Cedar Rapids BPCDT-19991028ACW | 27A IA Cedar Rapids BPCDT-19991028ACW |
| | 28A WI Milwaukee BDTV-00000368 | 28A WI Milwaukee BDTV-00000368 | 28A WI Milwaukee BDTV-00000368 | 28A WI Milwaukee BDTV-00000368 |
| | | | | |
| Baseline | 9,253,708 | 9,233,178 | 9,243,567 | 9,244,635 |
| Percentage of received IX | | 0.22% | 0.11% | 0.10% |
| | | | | |
| Results for: 28A IL BLOOMINGTON | | | | |
| HAAT 293.0 m, ERP 1000.0 kW | | | | |
| Population within NL Contour | 1,016,912 | 1,016,912 | 1,016,912 | 1,016,912 |
| not affected by terrain losses | 1,016,352 | 1,016,352 | 1,016,352 | 1,016,352 |
| lost to NTSC IX | 3,911 | 3,452 | 3,452 | 3,452 |
| lost to additional IX by DTV | 517 | 719 | 719 | 719 |
| lost to IX by DTV only | 2,384 | 2,384 | 2,384 | 2,384 |
| lost to all IX | 4,428 | 4,171 | 4,171 | 4,171 |
| | | | | |
| Potential Interfering Stations: | 27N IL Urbana BLCT-20020226AAA | 27N IL Urbana BLCT-20020226AAA | 27N IL Urbana BLCT-20020226AAA | 27N IL Urbana BLCT-20020226AAA |
| | 28N IA Cedar Rapids BLCT-19961002KE | 28N IA Cedar Rapids BLCT-19961002KE | 28N IA Cedar Rapids BLCT-19961002KE | 28N IA Cedar Rapids BLCT-19961002KE |
| | 28N IN Elkhart BLCT-19991223ACN | 28A IN Elkhart BDTV-00000110 | 28A IN Elkhart BMPCT-20050620ABX | 28A IN Elkhart Proposal |
| | 28A WI Milwaukee BDTV-00000368 | 28A WI Milwaukee BDTV-00000368 | 28A WI Milwaukee BDTV-00000368 | 28A WI Milwaukee BDTV-00000368 |
| | | | | |
| Baseline | 1,011,924 | 1,012,181 | 1,012,181 | 1,012,181 |
| Percentage of received IX | | -0.03% | -0.03% | -0.03% |
| | | | | |
| Results for: 28A WI MILWAUKEE | | | | |
| HAAT 305.0 m, ERP 1000.0 kW | | | | |
| Population within NL Contour | 3,001,756 | 3,001,756 | 3,001,756 | 3,001,756 |
| not affected by terrain losses | 2,990,946 | 2,990,946 | 2,990,946 | 2,990,946 |
| lost to NTSC IX | 10,305 | 8,950 | 8,950 | 8,950 |
| lost to additional IX by DTV | 124,735 | 125,487 | 125,724 | 125,629 |
| lost to IX by DTV only | 134,342 | 134,342 | 134,579 | 134,484 |
| lost to all IX | 135,040 | 134,437 | 134,674 | 134,579 |
| | | | | |
| Potential Interfering Stations: | 27N WI Madison BLCT-20000306AAW | 27N WI Madison BLCT-20000306AAW | 27N WI Madison BLCT-20000306AAW | 27N WI Madison BLCT-20000306AAW |
| | 28N IA Cedar Rapids BLCT-19961002KE | 28N IA Cedar Rapids BLCT-19961002KE | 28N IA Cedar Rapids BLCT-19961002KE | 28N IA Cedar Rapids BLCT-19961002KE |
| | 28N IN Elkhart BLCT-19991223ACN | 28A IN Elkhart BDTV-00000110 | 28A IN Elkhart BMPCT-20050620ABX | 28A IN Elkhart Proposal |
| | 28N WI Menomonie BMLET-20021118ACH | 28N WI Menomonie BMLET-20021118ACH | 28N WI Menomonie BMLET-20021118ACH | 28N WI Menomonie BMLET-20021118ACH |
| | 27A IL Chicago BMPCDT-20021202ABR | 27A IL Chicago BMPCDT-20021202ABR | 27A IL Chicago BMPCDT-20021202ABR | 27A IL Chicago BMPCDT-20021202ABR |
| | 28A IL Bloomington BMPCDT-20030805AHV | 28A IL Bloomington BMPCDT-20030805AHV | 28A IL Bloomington BMPCDT-20030805AHV | 28A IL Bloomington BMPCDT-20030805AHV |
| | 28A WI Eagle River BMPCDT-20041001ANY | 28A WI Eagle River BMPCDT-20041001ANY | 28A WI Eagle River BMPCDT-20041001ANY | 28A WI Eagle River BMPCDT-20041001ANY |
| | 29A IL Chicago BLCDT-20010531ACY | 29A IL Chicago BLCDT-20010531ACY | 29A IL Chicago BLCDT-20010531ACY | 29A IL Chicago BLCDT-20010531ACY |
| | 27A WI Appleton BDTV-00000193 | 27A WI Appleton BDTV-00000193 | 27A WI Appleton BDTV-00000193 | 27A WI Appleton BDTV-00000193 |
| | | | | |
| Baseline | 2,855,906 | 2,856,509 | 2,856,272 | 2,856,367 |
| Percentage of received IX | | -0.02% | -0.01% | -0.02% |

Prepared by
Lohnes and Culver Laurel, Maryland
October 2007

FIGURE 7
SUMMARY OF INTERFERENCE ANALYSES
RE: 28A IN ELKHART

| AFFECTED STATIONS | 28A IN ELKHART | | | |
|---|---|---|---|---|
| | Baseline Calculation (Certification Database) | 7th FNPRM, FCC 06-150 Appendix B Facilities | 7th R&O, FCC 07-138 Appendix B Facilities | Petiton for Reconsideration Proposed Appendix B Facilities |
| Results for: 29A IL CHICAGO | | | | |
| HAAT 508.0 m, ERP 350.0 kW | | | | |
| Population within NL Contour | 9,540,682 | 9,540,682 | 9,540,682 | 9,540,682 |
| not affected by terrain losses | 9,539,142 | 9,539,142 | 9,539,142 | 9,539,142 |
| lost to NTSC IX | 1,369 | 415 | 415 | 415 |
| lost to additional IX by DTV | 44,222 | 45,176 | 45,176 | 45,176 |
| lost to IX by DTV only | 45,518 | 45,518 | 45,518 | 45,518 |
| lost to all IX | 45,591 | 45,591 | 45,591 | 45,591 |
| | | | | |
| Potential Interfering Stations: | 28N IN Elkhart BLCT-19991223ACN | 28A IN Elkhart BDTV-00000110 | 28A IN Elkhart BMPCT-20050620ABX | 28A IN Elkhart Proposal |
| | 29N IN Kokomo BLCT-19880523KI | 29N IN Kokomo BLCT-19880523KI | 29N IN Kokomo BLCT-19880523KI | 29N IN Kokomo BLCT-19880523KI |
| | 29A WI Wausau DTVPLN-DTVP0772 | 29A WI Wausau DTVPLN-DTVP0772 | 29A WI Wausau DTVPLN-DTVP0772 | 29A WI Wausau DTVPLN-DTVP0772 |
| | 30A IN South Bend DTVPLN-DTVP0786 | 30A IN South Bend DTVPLN-DTVP0786 | 30A IN South Bend DTVPLN-DTVP0786 | 30A IN South Bend DTVPLN-DTVP0786 |
| | 28A WI Milwaukee BDTV-00000368 | 28A WI Milwaukee BDTV-00000368 | 28A WI Milwaukee BDTV-00000368 | 28A WI Milwaukee BDTV-00000368 |
| | | | | |
| Baseline | 9,493,551 | 9,493,551 | 9,493,551 | 9,493,551 |
| Percentage of received IX | | 0.00% | 0.00% | 0.00% |

Prepared by
Lohnes and Culver Laurel, Maryland
October 2007